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14 ROWLAND MARCUS ANDRADE

15 **UNITED STATES DISTRICT COURT**

16 **NORTHERN DISTRICT OF CALIFORNIA**

17 **SAN FRANCISCO DIVISION**

18 UNITED STATES OF AMERICA,

19 Case No. 3:20-cr-00249-RS

20 Plaintiff,

21 **DECLARATION OF DAINEC P. STEFAN**
22 **IN SUPPORT OF DEFENDANT**
23 **ANDRADE'S MOTION FOR A NEW**
24 **TRIAL**

25 v.

26 ROWLAND MARCUS ANDRADE,

27 Defendant.

28 Judge: Hon. Richard Seeborg, Chief Judge
Hearing: June 24, 2025 9:30 a.m.

DECLARATION OF DAINEC P. STEFAN

Dainec P. Stefan, counsel for Defendant Marcus Andrade, states as follows:

1. I am one of the lawyers representing Defendant Marcus Andrade in the above-captioned matter. I have personal knowledge of the factual matters contained herein based upon my review of the evidence and, if called as a witness in this matter, could competently testify to the matters stated in this Declaration.

2. Following the conclusion of trial on Thursday, March 18, 2025, the Court informed the jury that if they wished, after he had thanked them for their service, they could return to the courtroom to speak with counsel for Mr. Andrade and the United States and offer their feedback on the parties' presentations of their respective cases. Tr. 3166:17 – 3167:2.

3. Some number of jurors did return to the courtroom to speak with counsel for both sides. During this feedback, one of the jurors expressed how helpful it was that Mr. Chou's closing argument was replete with citations to exhibits that the jurors could review, and the other jurors present shared their agreement.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on May 23, 2025, in New York, NY.

/s/ Dainec P. Stefan
Dainec P. Stefan